

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

MORKITER JONES

PLAINTIFF

VS.

CAUSE NO.: 1:18cv193-MPM-DAS

**JARED BOOTH;
CITY OF COLUMBUS, MISSISSIPPI,
PARTICULARLY COLUMBUS POLICE
DEPARTMENT; and,
UNKNOWN DEFENDANTS A-Z**

DEFENDANT(S)

**MOTION FOR ADDITIONAL TIME TO ANSWER
DEFENDANT'S, JARED BOOTH, MOTION TO DISMISS**

COMES NOW, the Plaintiff, Morkiter Jones, by and through Counsel, Brad Morris, and files her *Motion for Additional Time to Answer Defendant's, Jared Booth, Motion to Dismiss* and would show unto the Court as follows:

1. Defendant, Jared Booth, by and through Counsel filed his *Motion to Dismiss* on March 4, 2019.
2. On March 5, 2019, Plaintiff received a Notice of Hearing from the United States Bankruptcy Court for the Northern District of Mississippi for a hearing scheduled on March 20, 2019, for Defendant's *Motion to Extend Automatic Stay* on behalf of Jared A. Booth. A copy of which is attached hereto as Exhibit "A".
3. Plaintiff respectfully request that the time for Plaintiff's response to Defendant's *Motion to Dismiss* be extended until after the hearing in the bankruptcy court so that a determination can be made if the Defendant will still be a party to this claim.

4. Counsel for Plaintiff has a trial scheduled the same week as the response deadline to the Motion to Dismiss and is scheduled to be out of state for the remainder of that week at a CLE.
5. Plaintiff respectfully requests that the deadline for response to Defendant's Motion to Dismiss be extended until Wednesday, March 27, 2019.

WHEREFORE PREMISES CONSIDERED, the Plaintiff, Morkiter Jones, respectfully requests the Court extend Plaintiff's deadline to file her Response to Defendant's *Motion to Dismiss* until Wednesday, March 27, 2019.

RESPECTFULLY SUBMITTED, this the 8th day of March 2019.

By: /s/Brad Morris
BRAD MORRIS (MS BAR NO.: 104017)
Attorney for Plaintiff

Of Counsel:

BRAD MORRIS LAW FIRM, PLLC
POST OFFICE BOX 2136
OXFORD, MS 38655

1603 UNIVERSITY AVENUE
OXFORD, MS 38655
TELEPHONE: 662-701-0909
FACSIMILE: 888-636-8701
EMAIL: brad@bradmorrislawfirm.com

CERTIFICATE OF SERVICE

I, Brad Morris, do hereby certify that I have this day served via ECF, U.S. Mail, Electronic Mail, and/or Hand Delivery/Process Server, a true and correct copy of the above and foregoing *Motion* to:

Katherine Kerby, Esq.
Kerby Law Firm
P.O. Box 551
Columbus, MS 39703
Attorney for Defendant, Jared Booth

Jeff Turnage, Esq.
Mitchell, McNutt, & Sams
P.O. Box 1366
Columbus, MS 39703-1366
Attorney for Defendant, City of Columbus

THIS the 8th day of March 2019.

/s/Brad Morris

BRAD MORRIS